

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES, et al.,	)	
	)	
Plaintiffs,	)	
v.	)	No. 1:23-cv-00108-LMB-JFA
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	

**MOTION FOR PROTECTIVE ORDER TO PREVENT  
DEPOSITION OF UNITED STATES' COUNSEL**

The United States moves pursuant to Federal Rule of Civil Procedure 26(c)(1) for a protective order forbidding Google LLC from seeking Rule 30(b)(6) deposition testimony from counsel for the United States' counsel from the Antitrust Division of the Department of Justice, or other Antitrust Division personnel. The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order is attached.

Dated: August 22, 2023

Respectfully submitted,

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